

EXHIBIT A

Deposition Transcript

Case Number: 1:23-cv-02818-VMC

Date: November 20, 2024

In the matter of:

LOUIS VUITTON MALLETIER v CONTOUR 5151 ONH, LLC, et al.

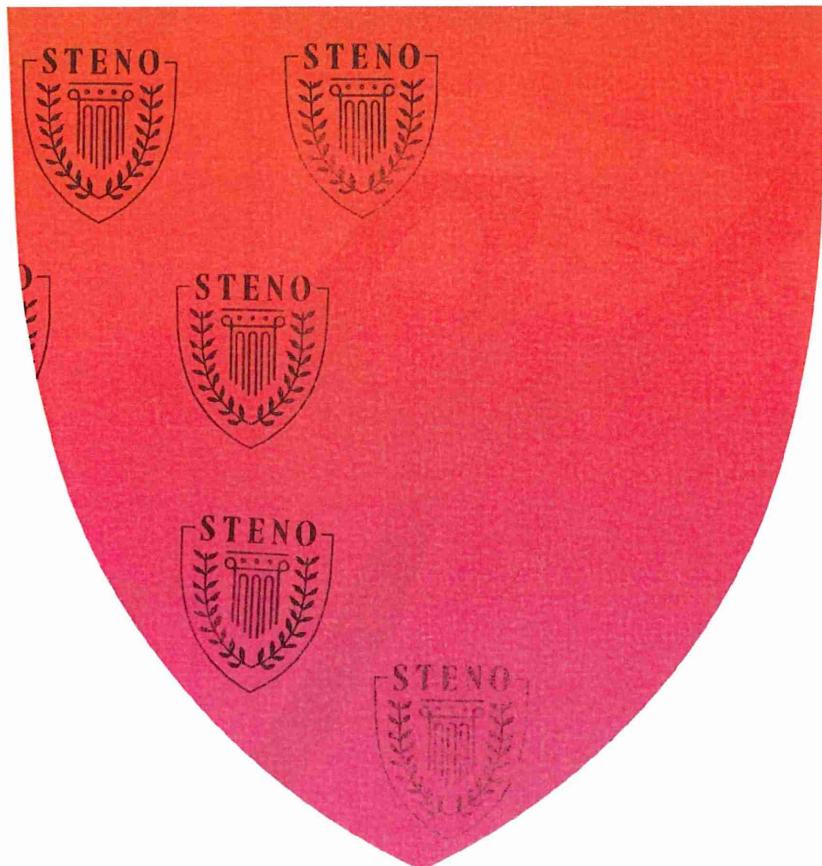
Peter Devukaj - CORP. REP. & INDIVIDUAL

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PETER DEDVUKAJ - CORP. REP. & INDIVIDUAL
NOVEMBER 20, 2024

JOB NO. 1288886

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

LOUIS VUITTON MALLETIER, S.A.S.,
Plaintiff,

vs. Civil Action No.
1:23-cv-02818-vmc

CONTOUR 5151 ONH, LLC, a Georgia Limited liability company d/b/a Old National Discount Mall; ABC CORPS. 1-10; and JOHN DOES 1-10, Individually,
Defendants.

Videotaped deposition of PETER DEDVUKAJ,

Taken by Joseph Ecker,

Before Amanda F. Rogers,
Certified Court Reporter,

At the Law Offices of
Nelson Mullins Riley & Scarborough, LLP,
Atlanta, Georgia,

On Wednesday, November 20, 2024,
Beginning at 10:05 a.m. and ending at 6:27 p.m.

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1 APPEARANCES OF COUNSEL

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12
13 ALSO PRESENT:

14 Chris Bennett, Videographer

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1 hear that more than -- just give strict dates.

2 BY MR. ECKER:

3 Q And knowing that there was at least
4 some period of time that it would have to operate
5 the mall, did Contour do anything to prepare to
6 operate the Old National Discount Mall?

7 A No. We just kept the existing manager
8 in place, Greg Dickerson. We didn't do nothing.
9 We didn't even walk the mall.

10 Q So prior to closing on the property,
11 did anyone affiliated with Contour visit the Old
12 National Discount Mall?

13 A No.

14 Q And did anyone, you know, talk to
15 prior owners about what operating the discount
16 mall entailed?

17 A No.

18 Q Did anyone talk to Greg Dickerson
19 about what operating the discount mall entailed?

20 A We had -- Greg Dickerson, he himself
21 said he would stay and operate the mall in the
22 meantime while things get put in place. In the
23 meantime, we are going to make our positions of
24 the parcels around for us and move forward with
25 development. We had more conversations with Greg

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1 about different developments because it seemed
2 that he is very knowledgeable about the area and
3 surrounding Atlanta very well. So that is why I
4 stayed in touch with Greg talking to him. Not
5 many other conversations, but just basically
6 about new developments and new acquisitions of
7 the land. Again, we had zero interest in a mall
8 then, today or tomorrow. Zero interest.

9 Q So did Contour just rely on Greg
10 Dickerson to operate the mall?

11 A We did at that time.

12 Q Just going back to this Exhibit 11
13 real quick. And Joe Nathan says, "Just
14 collecting rent and basic maintenance." Was that
15 Contour's understanding of what operating the Old
16 National Discount Mall entailed?

17 A I guess so. Again, we -- it can go
18 back to the same question. Same answer. You can
19 ask me all of the answers. All of the questions,
20 same answer. We never intended to operate the
21 mall or never given thought toward educating
22 ourselves about operating the mall then or even
23 today. We don't -- we don't want to operate the
24 mall. We are caught between the timing and Covid
25 and other issues and high interest rates and it

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1 hurt the people there. It hurt the area, it hurt
2 the jobs because we were employing a lot of other
3 places 100 percent College Park residents. It
4 hurt everybody there. This political reasons
5 and, of course, Covid and economy, it hurt
6 everybody. So our intention always is the same.
7 We can go back to anything. It is always the
8 same answer.

9 Q Well, I mean, knowing that it was
10 going to operate the property, did Contour assess
11 if there were any risks with doing that?

12 A No. When you don't have an intention
13 to do something or you don't want, you don't know
14 the risks. And we didn't have an intention or
15 desire ever to operate.

16 Q So why did Contour decide that it
17 needed to operate the property for some period of
18 time after it purchased it?

19 A We were paying the loan and expenses
20 and taxes.

21 Q So the reason that it operated the
22 market after the closing was to generate revenue
23 to help pay some of those expenses?

24 A Market and all other stores around the
25 market. Market wasn't the only thing. We are

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1 Q Did Contour ever investigate what this
2 judgment was?

3 A To my knowledge, no. It was a title
4 company to do it and attorney to close the deal.
5 That is not what we do.

6 (Whereupon a document was identified as
7 Plaintiff's Exhibit 27.)

8 BY MR. ECKER:

9 Q I am going to pull up a document. I
10 will mark it as Exhibit 28. Are we on 28?

11 THE COURT REPORTER: 27.

12 BY MR. ECKER:

13 Q 27. This is CF00253.

14 A I have two 25s here.

15 Q I think the title document should be
16 26. That's my apology.

17 A Okay.

18 Q All right. Thank you. So I am going
19 to hand you a document I am going to mark as 27
20 and again, this is CF00253. And do you see that
21 this is a document entitled, "Stewart Title
22 Guarantee Company combined statement"?

23 A Yes.

24 Q And you see it says, "sellers, Yes
25 Assets, LLC"?